Letter of Comment No: 41 File Reference: 1101-SCU Date Received: 03116103

## **Stacey Sutay**

Subject: FW: mandatory epensing of stock options

----Original Message----

From: AK [mailto:akluender@wi.rr.com] Sent: Sunday, March 16, 2003 8:33 PM

To: John Wulff; Mike Crooch; Neel Foster; Robert Herz; Gary Schieneman; Katherine Schipper; Edward Trott

Subject: mandatory epensing of stock options

Dear Messrs. Crooch, Foster, Herz, Schieneman, Trott, Wullf and Ms. Schipper:

I'm writing to express my opposition to any proposed changes which would result in companies being forced to expense stock options. There is no accurate means to value the expense of options. Therefore any mandatory expensing can only result in potentially misleading and inaccurate impacts on balance sheets. In addition, there already exists established guidelines for disclosure of stock options.

Any action on your part to enact mandatory expensing will only hurt the rank and file employees of the companies impacted by the changes. Executive level employees will continue to have options as part of their compensation packages. It is the lower level employees who will loose their options.

Your actions will not improve financial reporting and will only result in killing broad based option plans that largely benefit the rank and file employees. I urge you to refrain.

Sincerely.

Allen F. Kluender Menomonee Falls, WI